## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

FRANCHISE GROUP, INC., et al.,

Case No. 24-12480 (LSS) (Jointly Administered)

Debtors.

Related D.I. 1059

NOTICE OF SUBMISSION OF CLAIMS RELATING TO THE FIRST OMNIBUS (NON-SUBSTANTIVE) OBJECTION OF THE AD HOC GROUP OF FREEDOM LENDERS TO CERTAIN CLAIMS FILED AGAINST THE HOLDCO DEBTORS

PLEASE TAKE NOTICE that pursuant to Del. Bankr. L.R. 3007-l(e)(iv), The Ad Hoc Group of Freedom Lenders (the "Freedom Lender Group") delivered copies of the proofs of claim (the "Claims") objected to in the Freedom Lender Group's First Omnibus Objection to Certain Claims Filed Against The Holdco Debtors (the "Objection") to The Honorable Laurie S. Silverstein on April 28, 2025.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 3007-l(e)(iv)(C) a copy of the claims may be obtained by contacting the undersigned counsel.

Dated: April 28, 2025 Respectfully submitted,

## **FARNAN LLP**

/s/ Michael J. Farnan

Brian E. Farnan (Bar No. 4089) Michael J. Farnan (Bar No. 5165) 919 North Market Street, 12th Floor Wilmington, DE 19801 (302) 777-0300 bfarnan@farnanlaw.com mfarnan@farnanlaw.com

-and-

## WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*) Southeast Financial Center 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131

Telephone: (305) 371-2700 Facsimile: (305) 358-5744 Email: tlauria@whitecase.com

-and-

J. Christopher Shore (admitted *pro hac vice*)
Andrew T. Zatz (admitted *pro hac vice*)
Colin West (admitted *pro hac vice*)
Samuel P. Hershey (admitted *pro hac vice*)
Erin Smith (admitted *pro hac vice*)
Brett Bakemeyer (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113

Facsimile: (212) 354-8113
Email: cshore@whitecase.com
 azatz@whitecase.com
 sam.hershey@whitecase.com
 erin.smith@whitecase.com
 brett.bakemeyer@whitecase.com

Counsel to the Ad Hoc Group of Freedom Lenders